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*Devoe Coatings, Inc., Georgia-Pacific Corp., and*  
*Sears Holding Management Corp.*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
(CAMDEN VICINAGE)**

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In re:

Shapes/Arch Holdings L.L.C.,  
Shapes L.L.C., Delair L.L.C., Accu-Weld  
L.L.C., and Ultra L.L.C.

Debtors

(Hon. Gloria M. Burns)

Chapter 11

Lead Case No. 08-14631 (GMB)  
(Jointly Administered)

Hearing Date: July 1, 2008 at 10:00 a.m.

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**NOTICE OF MOTION OF CERTAIN DIRECT GENERATOR DEFENDANTS FOR  
RELIEF FROM AUTOMATIC STAY TO PERMIT DISMISSAL OF DEBTORS FROM  
JOINT DEFENSE GROUP**

PLEASE TAKE NOTICE that Certain Direct Generator Defendants by and through their counsel, Archer & Greiner, P.C.; Dewey & LeBoeuf LLP and Norris, McLaughlin & Marcus, P.A. (as local counsel); Conrad O'Brien Gellman & Rohn, P.C.; Shook Hardy & Bacon, LLP and Wolff & Samson PC (as local counsel); Drinker Biddle & Reath LLP, Latham & Watkins, LLP; Saul Ewing LLP and Sachs, Maitlin, Fleming & Greene, have filed a motion seeking entry of an Order granting relief from the automatic stay provisions of 11 U.S.C §362(a) to permit dismissal of Debtors from a Joint Defense Group in a case captioned Pennsauken Solid Waste Management Authority and Township of Pennsauken, et al. v. Ward Sand & Materials, Inc., et al., Docket No.

CAM-L-13345-91 and Docket No. CAM-L-13345-93 (the “Pennsauken Action”) (the “Motion”).

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the Court to grant the relief requested by the Movant, or if you want the Court to consider your views on the Motion, then on or before June 24, 2008, you or your attorney must:

File with the Court an answer explaining your position at: Clerk, U.S. Bankruptcy Court, 400 Cooper Avenue, Camden, New Jersey 08101. If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above. You must also mail a copy to: Deborah L. Shuff, Drinker Biddle & Reath LLP, One Logan Square, 18<sup>th</sup> & Cherry Streets, Philadelphia, PA 19103; and

Attend a hearing scheduled to be held on July 1, 2008, at 10:00 a.m. in Courtroom 4C, United States Bankruptcy Court, 400 Cooper Avenue, 4<sup>th</sup> Floor, Camden, New Jersey 08101.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief.

**DRINKER BIDDLE & REATH LLP**

Dated: June 9, 2008

By: David B. Aaronson  
David B. Aaronson